

### **REMARKS/ARGUMENTS**

Claims 1-4 stand rejected under 35 U.S.C. §102(b) over U.S. Patent No. 5,008,739 (D'Luna). Applicants respectfully traverse the rejection. With regard to claim 1, D'Luna does not disclose estimating interpolated color values using color values from four direct neighbors in a sub-block. Instead, D'Luna merely interpolates color values of a single horizontal line, not four direct neighbors. That is, a horizontal finite impulse response filter is used in D'Luna in which a pixel configuration of "(G) (G) (R/B) (G) (G) (G)" is input into registers of the digital filter. *See* D'Luna, col. 6, ln. 42 – col. 7, ln. 10. For at least this reason, claim 1 and claims 2 and 3 and new claim 22 depending therefrom are patentable over D'Luna.

The rejection of pending claims 18-20 under 35 U.S.C. §103(a) over D'Luna is improper, at least for the same reasons discussed above regarding claim 1. Furthermore, there is no teaching or suggestion to modify the hardware architecture of D'Luna into the claimed software program. Accordingly, for this further reason, claims 18-20 are further patentable.

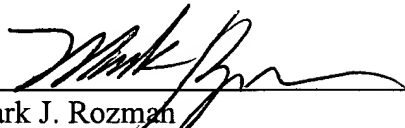
For at least the reasons discussed above regarding claim 1, new claims 23-26 are also patentable over the cited art.

Claims 5-6 stand rejected under 35 U.S.C. §103(a) over D'Luna in view of U.S. Patent No. 6,404,918 (Hel-or). Applicants respectfully traverse the rejection. Claim 5 is patentable at least for the reasons discussed above regarding claim 4, from which it depends. Claim 5 is further patentable, as the combination of D'Luna and Hel-or does not teach or suggest claim 5. Specifically, neither reference teaches or suggests determining that a sub-block is a smooth zone and averaging color values from direct neighbors to obtain an interpolated value. D'Luna nowhere teaches such operation. Nor does Hel-or, as instead that reference performs a weighted sum of values of neighboring pixels. This weighted sum is not an average, and the neighboring pixels are not the four direct neighbor pixels. For these further reasons, claims 5 and 6 are patentable over the proposed combination.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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